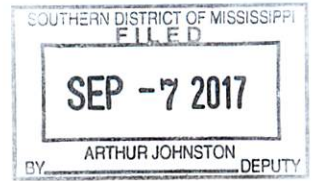


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:17CR87450-JCG

TRAVIUS RASHAD BROADNAX and  
HARLEM SLAUGHTER TURNER IV

18 U.S.C. § 371  
18 U.S.C. § 1029(a)(3)

**The Grand Jury charges:**

COUNT 1

From sometime in January 2017 through on or about February 1, 2017, in Jackson County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TRAVIUS RASHAD BROADNAX and HARLEM SLAUGHTER TURNER IV** did willfully, knowingly, and unlawfully combine, conspire, confederate, and agree together with each other and with other persons, both known and unknown to the Grand Jury, to commit certain offenses against the United States, which affected interstate commerce, to-wit:

to knowingly and with intent to defraud, possess at least fifteen (15) counterfeit access devices, in violation of 18 U.S.C. § 1029(a)(3).

As part of the above-described conspiracy and in furtherance of said conspiracy, and to effect the object thereof, the defendants did perform the following overt acts:

1. On or about January 31, 2017, **TRAVIUS RASHAD BROADNAX** utilized the fraudulently obtained credit card number of another person to make a fraudulent purchase in the State of Florida.

2. On or about February 1, 2017, **TRAVIUS RASHAD BROADNAX** utilized the fraudulently obtained credit card number of another person to make a fraudulent purchase in the State of Florida.
3. On or about February 1, 2017, **TRAVIUS RASHAD BROADNAX** utilized the fraudulently obtained credit card number of another person to make a fraudulent purchase in the State of Alabama.
4. On or about February 1, 2017, **TRAVIUS RASHAD BROADNAX and HARLEM SLAUGHTER TURNER IV** traveled from the State of Florida to the State of Mississippi.

In violation of Section 371, Title 18, United States Code.

#### COUNT 2

That on or about February 1, 2017, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants **TRAVIUS RASHAD BROADNAX and HARLEM SLAUGHTER TURNER IV**, aided and abetted by one another, knowingly and with intent to defraud, possessed fifteen or more counterfeit access devices, that is counterfeit debit and credit cards, said activity affecting interstate commerce, all in violation of Sections 1029(a)(3) and 2, Title 18, United States Code.

#### NOTICE OF FORFEITURE

As a result of the offense specified above, **TRAVIUS RASHAD BROADNAX and HARLEM SLAUGHTER TURNER IV** shall forfeit to the United States any and all property involved in such offense, or constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation and any personal property used or intended to be used to commit such violation.

Further, if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be divided without difficulty,

then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant up to the value of the property described above.

All pursuant to Sections 982(a)(2), 982 (a)(2)(B) and 1029(c)(1)(C) Title 18, United States Code.

  
HAROLD BRITTAIN  
Acting United States Attorney

A TRUE BILL:

s/signature redacted

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand jury on this the 7<sup>th</sup> day of September, 2017.

  
UNITED STATES MAGISTRATE JUDGE